Remarks/Arguments

A.   Claims in the Case

Claims 1-7, 9-11, 13-19, 21-30, 32-34, 36-42, 44-57, 59-61, 63-69, 71-73, and 147-152 are pending.   Claims 1, 2, 10, 11, 19, 24, 25, 33, 34, 42, 51, 61, and 69 have been amended. Claims 147-152 are new. Claims 8, 12, 20, 31, 35, 43, 58, 62, and 70 have been cancelled.

B.   Double Patenting

The Examiner provisionally rejected claims 1-73 as claiming the same invention as copending Application No. 09/699,015.   Applicant has amended claims 1, 24, 27 to recite a combination of features including, but not limited to: "creating a highest level processing relationship object in a processing relationship structure, wherein the highest level processing relationship object represents an FSO; and creating a plurality of lower level processing relationship objects in the processing relationship structure, wherein the plurality of lower level processing relationship objects in the processing relationship structure are descendents of the highest level processing relationship object; wherein at least one of the plurality of lower level processing relationship objects represents a company of the FSO, a business unit of the FSO, a bank branch office, a regional bank, a credit card issuer, or an acquirer." Applicant respectfully requests removal of the provisional rejections of claims 1-73.

C.   Objection

Claim 2 was objected to because the claim reads "...processing relationship value from an FSO transaction related data in the FSO computer system."   Applicant has amended claim 2 recite "processing relationship value from a Financial Services Organization (FSO) transaction

related data in the FSO computer system". Applicant respectfully requests removal of this objection.

D. The Claims Are Not Indefinite Pursuant to 35 U.S.C. § 112, Second Paragraph

The Examiner rejected claims 19, 42, 69, and 488 as being indefinite under 35 U.S.C. § 112, second paragraph. Applicant notes that claim 488 has been cancelled in this application. Applicant has amended claims 19, 42, and 69 for clarification. Applicant requests removal of the rejections under 35 U.S.C. § 112, second paragraph.

E. The Claims Are Not Anticipated By Sziklai Under 35 U.S.C. §102(b)

Claims 1-73 were rejected under 35 U.S.C. §102(b) as being anticipated by U.S. Patent No. 6,341,287 to Sziklai et al. (hereinafter referred to as "Sziklai"). Applicant respectfully disagrees with these rejections.

The standard for "anticipation" is one of fairly strict identity. To anticipate a claim of a patent, a single prior source must contain all the claimed essential elements. *Hybritech, Inc. v. Monoclonal Antibodies, Inc.*, 802 F.2d 1367, 231 U.S.P.Q.81, 91 (Fed. Cir. 1986); *In re Donahue*, 766 F.2d 531, 226 U.S.P.Q. 619, 621 (Fed. Cir. 1985).

Amended claims 1, 24, and 51 describe combinations of features including, but not limited to:

creating a highest level processing relationship object in a processing relationship structure, wherein the highest level processing relationship object represents an FSO; and
creating a plurality of lower level processing relationship objects in the processing relationship structure, wherein the plurality of lower level processing relationship objects in the processing relationship structure are

descendents of the highest level processing relationship object; wherein at least one of the plurality of lower level processing relationship objects represents a company of the FSO, a business unit of the FSO, a bank branch office, a regional bank, a credit card issuer, or an acquirer

Support for the amendments to claims 1, 24, and 51 may be found at least in cancelled claims 8 and 20 and on page 8, line 23 through page 9, line 4; page 17, lines 8-27; page 21, line 14 to page 22, line 27, page 43; lines 25-27; FIG. 2-4 of Applicant's specification. For example, page 8, line 23 through page 9, line 4, of Applicant's specification state:

As used herein, a Financial Service Organization (FSO) is a business organization that provides financial services to customers and client organizations. As used herein, the term customer generally refers to an individual, and client organization generally refers to other businesses, including retail businesses and other FSOs. Services provided to customers and client organizations include credit products, such as loans and credit cards. An FSO may also provide services to client organizations such as credit card transaction processing. Examples of FSOs include, but are not limited to, banks, credit unions, insurance companies, mutual fund companies, credit card companies and brokerage houses. An FSO that issues credit cards and processes credit card transactions may be referred to as a credit card institution. An FSO may include one or more organizational units. Examples of organizational units include, but are not limited to, main offices, divisions, regional offices, and branch offices.

Page 17, lines 4-15 of Applicant's specification state:

The FSO business units may be represented in a chart or a similar graphical form to illustrate the attributes of an FSO organization such as, but not limited to, the reporting relationship between various FSO entities, the reporting structure, the number of hierarchical levels between the highest level entity and the lowest level entity, and the number of direct reports for an FSO entity. Each FSO entity may be represented as a node or a block on an FSO organizational chart. For example, global bank is represented as node 2250, the business unit for Americas by node 2252, the business unit for Europe, Middle East and Africa by node 2254. Each node may have a parent node and one or more children nodes. For example, USA business unit 2256 has a parent node Americas 2252 and has two children nodes, region AUE 2260 and region AUW 2258. Each node may be identified uniquely with a node number and/or a name. The FSO organizational

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chart may include multiple levels 2266 in the hierarchical relationship.

Page 17, lines 23-29 of Applicant's specification state:

> In one embodiment, an FSO user may create a similar or identical processing relationship structure modeled after the FSO business organization. In one embodiment, an FSO user may use a processing relationship configuration software program to configure or define the processing relationships between various FSO entities which represent the FSO business organization. In one embodiment, an FSO user may configure a node in the processing relationship structure to provide the same or similar functionality provided by the real-world FSO entity. In one embodiment, there may be a one-to-one correspondence between a node included in the FSO business organization chart and a node included in the processing relationship structure.

Sziklai does not appear to teach or suggest at least the above-quoted features of claims 1, 24, and 51, in combination with the other features of the claims.

Sziklai states:

> The View Business Area table 36 records information about business area Views in the system. The Business Area table 37 holds the definition of business areas and forms a high level grouping of various business functions that can be implemented using the system. The business process business area table 38 records information about business area processes in the system. The business area worklist table 39 records worklists for the business area. The View parameter table 40 holds the parameters that define all views in the system.
> (Sziklai, column 22, line 34 to column 23, line 36)

Sziklai further states:

> In a similar manner, reports and other output documents exist only in the metadata created through the Java data management layer. These output documents are produced by interpreting the metadata and by extracting data from the particular business content chosen. Events may be set up based on one or more changes in the business content data, but processing of an event depends on metadata that defines the event. Processing steps can be created to summarize and "filter" data, depending upon the metadata defining the summarization and

filtering techniques. Data can be imported from, and exported to, other systems based on metadata definitions of data structures.
(Sziklai, column 15, lines 21-32)

Assume that a data entry form is to be created based on the Department Table of the invention. FIG. 6 is a flow chart showing the steps used to accomplish this. In step 101, the Form Builder function is launched from the Tools Menu. In step 103, the form is given a name, and the Department Table is selected as the base table. In step 105, one or more fields are chosen for incorporation in the data entry form, and the form is uploaded to the network. A maximum of three steps is required to create a data entry form using the invention. The data entry form and its definition may be assumed to be bug-free, because the underlying Form Builder has been thoroughly tested and confirmed to generate the correct metadata definition of the desired form.
(Sziklai, column 16, lines 22-34)

Sziklai appears to teach a "Business Area" table that hold definitions of business areas and forms a high level grouping of various business functions. In addition, Sziklai appears to teach documents produced by interpreting metadata and extracting data from a particular business content. Sziklai further appears to teach a data entry form based on a "Department Table". Sziklai does not appear to teach or suggest creating a highest level processing relationship object in a processing relationship structure representing an FSO and creating lower level processing relationship objects in the processing relationship structure that are descendents of the highest level processing relationship object, wherein lower level processing relationship objects represent a company of the FSO, a business unit of the FSO, a bank branch office, a regional bank, a credit card issuer, or an acquirer, in combination with the other features of the claims.

Applicant submits that, for at least the reasons discussed above, claims 1, 24, and 51 and the claims depending thereon are patentable over the cited art. Applicant therefore respectfully requests removal of the 35 U.S.C. §102(b) rejections of these claims.

Applicant submits that many of claims dependent on claims 1, 24, and 51 are independently patentable. For example, amended claim 2 recites: "wherein each processing relationship definition stored in the database is configured for use in preparing a processing relationship value from a Financial Services Organization (FSO) transaction-related data in the FSO computer system." Sziklai does not appear to teach or suggest at least these features of claim 2, in combination with the other features of the claim.

Sziklai states:
> The report trigger table 56 records the triggers specified for reports in the system. The worklist item table 57 provides definitions of, and links to, modules launched from the worklist. The worklist table 58 provides the definitions and logic for worklists that facilitate work flow for a business activity. The calculation profile table 59 provides the definitions and logic to perform calculations related to data entry forms, for decision making and data input. The calculation profile value table 60 records the calculation profile variable values.
> (Sziklai, column 13, lines 23-32)

Sziklai further states:

> With reference to FIG. 3, the constraint column table 81 provides individual data elements for the business rules. The constraint table 82 provides the business rules defined at the database level for every table in the application system, together with the meaning of each rule. The column table 72 is characterized in the preceding. The column allowable value table 83 provides the business rules at a data element level. The autofill table 84 records the automatic data transfer setup. The arc column table 85 provides data elements that are part of every usually exclusive relationship in the system. The arc table 86 records the mutually exclusive relationships in the system. The lookup table 87 provides the lookup definitions for every child table in the system. The tablename table 69 is characterized in the preceding. The object table 88 holds the names of the database objects defined in the system. The about table 89 stores versions of, and copyright information concerning, the system. The datatype table 90 provides the datatype definitions throughout the system. The dependency tree table 91 provides the application and database hierarchy(ies). The color table 92 provides the color definitions for use in various tools.
> (Sziklai, column 13, line 58 to column 14, line 12)

Sziklai appears to teach tables that provide definitions and logic for worklists. Sziklai also appears to provide tables that define business rules and data elements for the rules. Sziklai does not appear to teach or suggest processing relationship definitions stored in a database that are configured for use in preparing a processing relationship value from a Financial Service Organization (FSO) transaction-related data in an FSO computer system.

Claim 3 recites: "wherein the processing relationship value is configured for use in identifying an FSO business entity as an owner of the FSO transaction-related data." Sziklai does not appear to teach or suggest at least these features of claim 3, in combination with the other features of the claim.

The portions of Sziklai cited in the Office Action for the above-quoted feature of claim 3 state:

> C. About Change Agent System describes the regulatory change system version information.
> The system provides a "business application browser" that combines Web browser technology with a selected set of business application items that are common to the tasks to be performed to implement information management for a given business area or requirement, including common functions such as work/task management, data entry, reporting, data processing and analysis, data presentation (printing, electronic display, distribution, etc.), and report and document preparation.
> (Sziklai, column 22, lines 10-20)

Sziklai appears to teach a business application browser that combines web browser technology with items common to tasks to be performed to implant information management for a given business area. Sziklai does not appear to teach or suggest a configuring a processing relationship value for use in identifying an FSO business entity as an owner of FSO transaction-related data.

Amended claim 11 recites: "wherein the displaying one or more processing relationship object representations on a display screen comprises displaying values associated with a sequence number for at least one of the plurality of lower level processing relationship objects and a level number for the at least one lower level processing relationship object, wherein the level number identifies a level in the processing relationship structure." Support for the amendments to claim 11 may be found in Applicant's specification at least on page 24, lines 10-21; FIG. 3-7. Sziklai does not appear to teach or suggest at least this feature of claim 11, in combination with the other features of the claim.

The portions of Sziklai cited in the Office Action for relative to claim 11 state:

> The arc table 86 records the mutually exclusive relationships in the system. The lookup table 87 provides the lookup definitions for every child table in the system. The tablename table 69 is characterized in the preceding. The object table 88 holds the names of the database objects defined in the system. The about table 89 stores versions of, and copyright information concerning, the system. The datatype table 90 provides the datatype definitions throughout the system. The dependency tree table 91 provides the application and database hierarchy(ies). The color table 92 provides the color definitions for use in various tools.
> (Sziklai, column 14, lines 1-12)

FIG. 5 of Sziklai depicts relationships between several "metadata" tables. Sziklai appears to disclose tables that hold definitions, relationships, names, versions of the system, copyright information, and application and database hierarchy. Sziklai does not appear to teach or suggest wherein displaying processing relationship object representations on a display screen comprise displaying values associated with a sequence number and a level number for a lower level processing relationship object, wherein the level number identifies a level in a processing relationship structure.

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F.   New Claims

New claim147 describes a combination of features including "wherein the plurality of lower level processing relationship objects comprises a credit card issuer object representing a credit card issuer and an acquirer object representing an acquirer, and wherein each of the credit card issuer object and the acquirer object has one or more descendent processing relationship objects." Support for the new claims may be found in Applicant's specification at least on page 17, lines 8-27; page 21, line 14 to page 22, line 27; FIG. 2-4. The cited art does not appear to teach or suggest at least the above-quoted feature of claim 147, in combination with the other features of the claim.

New claim 148 describes a combination of features including "wherein at least one of the one or more descendent processing relationship objects is a descendent of at least two precedent processing relationship objects, and wherein the at least two precedent processing relationship objects are at the same level in the processing relationship structure." Support for the new claims may be found in Applicant's specification at least on page 22, lines 11-16. The cited art does not appear to teach or suggest at least the above-quoted feature of claim 148, in combination with the other features of the claim.

New claim 149 describes a combination of features including "wherein at least one of the one or more descendent processing relationship objects represents a business unit of the FSO." Support for the new claims may be found in Applicant's specification at least on page 41, lines 21-23. The cited art does not appear to teach or suggest at least the above-quoted feature of claim 149, in combination with the other features of the claim.

New claim 150 describes a combination of features including "wherein at least one of the one or more descendent processing relationship objects represents a bank branch." Support for

the new claims may be found in Applicant's specification at least on page 41, lines 21-23. The cited art does not appear to teach or suggest at least the above-quoted feature of claim 150, in combination with the other features of the claim.

New claim 151 describes a combination of features including "wherein displaying the at least two processing relationship object representations comprises displaying a row for each of at least two processing relationship objects, wherein each of the rows comprises an object identifier and a level number, wherein the descendants of each object appear directly below that object." Support for the new claims may be found in Applicant's specification at least on page 25, lines 1-29; page 26, lines 1-13; FIGS. 4-6. The cited art does not appear to teach or suggest at least the above-quoted feature of claim 151, in combination with the other features of the claim.
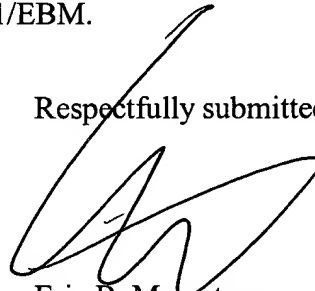
New claim 152 describes a combination of features including "wherein displaying the at least two processing relationship object representations comprises displaying a row for each of at least two processing relationship objects, wherein each of the rows comprises an object identifier and a level number, wherein the descendants of each object appear directly below that object." Support for the new claims may be found in Applicant's specification at least on page 25, lines 22-29. The cited art does not appear to teach or suggest at least the above-quoted feature of claim 152, in combination with the other features of the claim.

G.   Additional Remarks

Based on the above, Applicant submits that the claims are now in condition for allowance. Favorable reconsideration is respectfully solicited.

Applicant believes no fees are due with the submission of this document. If any extension of time is required, Applicant hereby requests the appropriate extension of time. If any fees are inadvertently omitted or if any fees are required or have been overpaid, please appropriately charge or credit those fees to Meyertons, Hood, Kivlin, Kowert & Goetzel, P.C. Deposit Account Number 50-1505/5053-30801/EBM.

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